

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES INVESTOR PROTECTION
CORPORATION,**

PLAINTIFF,

01789 (BRL)

Adv. Pro. No. 08-

SIPA LIQUIDATION

v.

**BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,**

DEFENDANT.

In Re:

BERNARD MADOFF,

DEBTOR

**IRVING H. PICARD. Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities, LLC**

PLAINTIFF

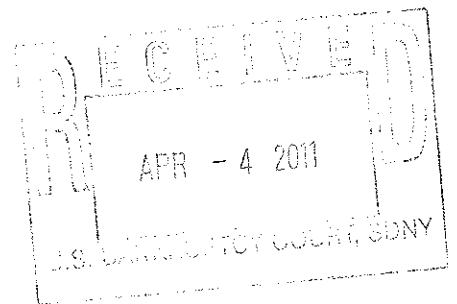
v.

**CHARLES ELLERIN IRREVOCABLE GIFT
GIVING TRUST.;**

Adv. Pro. No. 10-05219 (BRL)

**ROBERT M. GRIFFITH, in his capacity as
TRUSTEE of the CHARLES ELLERIN
IRREVOCABLE GIFT GIVING TRUST;**

JOSEPH C. ELLERIN, INDIVIDUALLY,



**as beneficiary of the CHARLES ELLERIN
IRREVOCABLE GIFT GIVING TRUST;**

**GLENN C. ELLERIN, INDIVIDUALLY,
as beneficiary of the CHARLES ELLERIN
IRREVOCABLE GIFT GIVING TRUST; and**

**JANET WINTERS, INDIVIDUALLY,
as beneficiary of the CHARLES ELLERIN
IRREVOCABLE GIFT GIVING TRUST.**

DEFENDANTS

**MOTION TO COMBINE CASES FOR THE PURPOSE OF
SUMMARY JUDGMENT SUBMISSION
MOTION FOR SUBMISSION**

TO THE HONORABLE JUDGE LIFLAND: DEFENDANT JANET WINTERS INDIVIDUALLY AND AS BENEFICIARY OF THE CHARLES ELLERIN IRREVOCABLE GIFT GIVING TRUST files this Motion for Submission and Motion to Combine Cases for the purpose of her Summary Judgment Motion in order to conserve the time and Judicial assets of this Court.

MOTION FOR SUBMISSION

In addition, DEFENDANT JANET WINTERS is at a distinct disadvantage in these cases because she resides about 1,700 miles from the Court and purchasing air fare and accommodations to comport with the Court's schedule is a burdensome expense especially after losing much of her assets from the Madoff fraud as shown in other cases before this Court Therefore she move this Court to decide this case upon submission only without the need for oral argument.

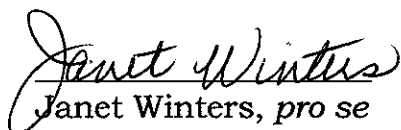
MOTION TO COMBINE

The following newly filed cases under Adv. Pro. No. 08-01789: AP 10-05219 and AP 10-04398 are sufficiently similar that the Motion for Summary Judgment filed in case AP 10-04398 pertains equally to case AP 10-05219. The parties are so similar that one case is duplicative of the other, so they should be decided on the same facts, and documents.

THEREFORE DEFENDANT JANET WINTERS Moves that this Court combine both these cases (AP 10-04398 and AP 10- 05219) for the purpose of Summary Judgment. A new order is provided to address both cases.

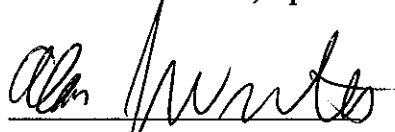
DEFENDANT JANET WINTERS Individually and as beneficiary of the CHARLES ELLERIN IRREVOCABLE GIFT GIVING TRUST prays that the Court grant these Motions in all respects, and for such other relief as the Court may deem appropriate

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Janet Winters", written over a horizontal line.

Janet Winters, *pro se*
804 Mulberry Lane
Bellaire, Texas 77401
713/662-0339

Alan J. Winters, spouse

A handwritten signature in cursive script, appearing to read "Alan J. Winters", written over a horizontal line.

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